

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RAW STORY MEDIA, INC., ALTERNET	:	
MEDIA, INC.,	:	NO. 1:24-cv-01514-CM
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
OPENAI, INC., OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPKO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, OPENAI	:	
HOLDINGS, LLC,	X	
Defendants.		
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**DECLARATION OF ROSE S. LEE IN SUPPORT OF MOTION FOR ADMISSION  
*PRO HAC VICE***

I, Rose S. Lee, declare as follows:

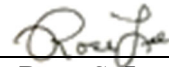
1. I am an attorney at law licensed to practice in the state of California. I submit this declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC, in the above-captioned action.
2. I am a member of good standing in the bar of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto.
3. Pursuant to Local Rule 1.3(c), I state:
  - a. I have never been convicted of a felony;

b. I have never been censured, suspended, disbarred, or denied admission or readmission by any court; and

c. There are no disciplinary proceedings presently against me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 26, 2024



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Rose S. Lee